

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

CHELSEY GOSSE, CHRISTOPHER	)	Case No. 3:20-cv-01446
DETTORE, AND LORI A DETTORE	)	
<i>on their own behalf and on behalf of</i>	)	
<i>other similarly situated persons</i>	)	RDM (Hon. Robert D. Mariani)
	)	MCC (Magistrate Judge Martin C. Carlson)
Plaintiffs,	)	
	)	Electronically Filed
v.	)	
	)	
TRANSWORLD SYSTEMS, INC.;	)	
U.S. BANK, N.A.; RATCHFORD	)	
LAW GROUP, P.C.; PORTNOY	)	
SCHNECK, L.L.C.; NATIONAL	)	
COLLEGIATE STUDENT LOAN	)	
TRUST 2007-3, NATIONAL	)	
COLLEGIATE STUDENT LOAN	)	
TRUST 2007-4; GSS DATA	)	
SERVICES LLC	)	

Defendants.

**RATCHFORD LAW GROUP P.C.'S MOTION TO DISMISS  
THE PLAINTFFS' FIRST AMENDED COMPLAINT**

Defendant Ratchford Law Group P.C. (“RLG”), moves to dismiss Plaintiffs’ First Amended Complaint for failure to state a claim upon which relief can be granted pursuant to Federal Rule of Civil Procedure 12(b)(6). Plaintiffs’ claims against RLG are based on the Fair Credit Extension Uniformity Act (“FCEUA”), civil conspiracy and wrongful use of proceedings under the Dragonetti Act. However, Plaintiffs do not, and cannot, plead facts to state such claims. Plaintiffs cannot plead facts to circumvent the Pennsylvania judicial privilege doctrine’s

absolute bar to their claims under the FCEUA, Unfair Trade Practice Consumer Protection Law and civil conspiracy. Further, Plaintiffs do not and cannot plead that they justifiably relied on RLG's conduct or representation and that they suffered harm as a result. They have failed to allege the wrongful purpose and other elements necessary to carry their Dragonetti Act claims. Without those underlying claims, Plaintiffs' civil conspiracy claim also fails. RLG will file its Brief in Support within 14 days pursuant to Local Rule 7.5.

Date: January 15, 2021

Respectfully submitted,

/s/ Michael F. Ratchford  
Michael F. Ratchford, Esq. (#86285)  
RATCHFORD LAW GROUP, P.C.  
54 Glenmaura National Blvd, Suite 104  
Moosic, Pa 18507  
Telephone: (570) 558-5510  
Facsimile: (570) 558-5511  
Email: [mratchford@ratchfordlawgroup.com](mailto:mratchford@ratchfordlawgroup.com)

**RULE 7.1 CERTIFICATION**

Pursuant to Middle District Local Rule 7.1, the undersigned hereby certifies that he sought the Plaintiff's and co-defendant' concurrence on the instant motion. Plaintiffs' counsel did not concur.

*/s/ Michael F. Ratchford* \_\_\_\_\_

Michael F. Ratchford

*Counsel for Defendant Ratchford Law Group, P.C.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of January 2021, I filed the foregoing with the Clerk of the United States District Court using the CM/ECF system, which will send notification electronically to all counsel of record.

*/s/ Michael F. Ratchford*  
Michael F. Ratchford

*Counsel for Defendant Ratchford Law Group, P.C.*